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Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC, and  
the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

THE PUBLIC INSTITUTION FOR SOCIAL  
SECURITY,

Defendant.

Adv. Pro. No. 12-01002 (CGM)

**MOTION TO REDACT CERTAIN EXHIBITS TO THE DECLARATION  
OF BRIAN W. SONG IN OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS THE COMPLAINT**

Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, respectfully submits this motion to redact pursuant to 11 U.S.C. §§ 105(a) and 107(c) of title 11 of the United States Bankruptcy Code.

1. On April 26, 2022, the Trustee filed the Declaration of Brian W. Song in Opposition to Defendant’s Motion to Dismiss the Complaint, ECF No. 123 (the “Song Declaration”).

2. The Song Declaration included certain exhibits that displayed confidential information (“Confidential Information”).

3. This Confidential Information should have been filed in redacted form pursuant to Rule 9037(a) of the Federal Rules of Bankruptcy Procedure.

4. The Trustee hereby requests that the Court enter the attached Proposed Order (Exhibit A) and the following exhibits (the “Exhibits”) be replaced with redacted versions:

- Exhibit 1 to the Song Declaration;
- Exhibit 2 to the Song Declaration;
- Exhibit 3 to the Song Declaration;
- Exhibit 4 to the Song Declaration;
- Exhibit 5 to the Song Declaration;
- Exhibit 6 to the Song Declaration.

5. The redacted versions of the Exhibits will be provided to the Court.

Dated: April 28, 2022  
New York, New York

/s/ Brian W. Song  
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7 Estate of Bernard L. Madoff*